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12 Chief, Tax Division  
*Of Counsel*

13  
14 IN THE UNITED STATES DISTRICT COURT  
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
16 OAKLAND DIVISION

17 IN RE: DEAN GORDON POTTER,  
18 Debtor.

Civil No. C-07-4826-CW

**Lead Case**

**STIPULATION AND REQUEST FOR ENTRY  
OF JUDGMENT, and ORDER**

21 UNICO SERVICES INC.,  
22 Plaintiff,  
23 v.  
24 THE UNITED STATES OF AMERICA,  
25 Defendant.

D.C. Civil No. C-08-00800-CW

**Consolidated Case**

27 Plaintiff the United States of America and defendants Dean Gordon Potter and Unico  
28 Services, Inc., by counsel, hereby agree and request entry of judgment in the following form:

1

2 **PROPOSED JUDGMENT**

3 1. Dean Gordon Potter is indebted to the United States for the tax years at issue  
 4 (described below in the table) in the total amount of \$2,447,599.43 for individual income tax,  
 5 penalties, interest, and statutory additions, plus interest according to 28 U.S.C. § 1961(c) and  
 6 26 U.S.C. §§ 6601, 6621(a)(2), from November 14, 2013, until the judgment is paid.

Type of Tax	Tax Period	Tax, Penalty, Interest Due <sup>1</sup>
IRS Form 1040	2000	\$289,850.78
IRS Form 1040	2001	\$623,625.91
IRS Form 1040	2002	\$265,786.35
IRS Form 1040	2003	\$230,716.73
IRS Form 1040	2004	\$132,394.03
IRS Form 1040	2005	\$81,489.84
International Penalties		\$823,735.79

14 2. Unico Services Inc. is indebted to the United States for the taxable year ending  
 15 June 30, 2001, in the total amount of \$135,542.75 for corporate income tax, interest, and  
 16 statutory additions, plus interest according to 28 U.S.C. § 1961(c) and 26 U.S.C. §§ 6601,  
 17 6621(a)(2), from November 14, 2013, until the judgment is paid.

18 3. Each party shall be liable for its own costs of litigation and attorneys' fees.

19 **END OF PROPOSED JUDGMENT**

20 Counsel respectfully request entry of a Judgment in a Civil Case in accordance with the  
 21 foregoing. A proposed Judgment is submitted herewith.

22 KATHRYN KENEALLY  
 23 Assistant Attorney General

24 Dated: November 13, 2013

25 /s/ G. Patrick Jennings  
 26 G. PATRICK JENNINGS  
 27 Trial Attorney, Tax Division  
 28 United States Department of Justice

1 Accruals of interest, penalties, statutory additions, and credits are calculated to  
 November 14, 2013.

1 Dated: November 13, 2013

/s/ Robert J. Stientjes  
2 ROBERT J. STIENTJES  
3 Stientjes & Tolu LLC  
4 9378 Olive Blvd., Ste. 307  
5 St. Louis, Missouri 63132  
(314) 743-3292

6 Attorneys for Potter, Unico

**ORDER**

7 In accordance with the stipulation of the parties set forth above,

8 **IT IS ORDERED THAT** the Clerk is directed to enter the proposed judgment submitted with this  
9 stipulation.

10 **IT IS SO ORDERED.**

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12 Dated: November 14, 2013

  
13 CLAUDIA WILKEN  
14 United States District Court Judge

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